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DEC 31 2018

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
DIVISION

JAMES HATTEN, Clerk
By: *[Signature]*
Dawson Taylor

(Print your full name)

Plaintiff *pro se*,

v.

Starbucks Corporation

(Print full name of each defendant; an employer is usually the defendant)

Defendant(s).

CIVIL ACTION FILE NO.

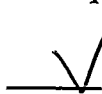
1:18-CV-5961

(to be assigned by Clerk)

PRO SE EMPLOYMENT DISCRIMINATION COMPLAINT FORM

Claims and Jurisdiction

1. This employment discrimination lawsuit is brought under (check only those that apply):



Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e et seq., for employment discrimination on the basis of race, color, religion, sex, or national origin, or retaliation for exercising rights under this statute.

NOTE: To sue under Title VII, you generally must have received a notice of right-to-sue letter from the Equal Employment Opportunity Commission ("EEOC").

_____ Age Discrimination in Employment Act of 1967, 29 U.S.C. §§ 621 et seq., for employment discrimination against persons age 40 and over, or retaliation for exercising rights under this statute.

NOTE: To sue under the Age Discrimination in Employment Act, you generally must first file a charge of discrimination with the EEOC.

_____ Americans With Disabilities Act of 1990, 42 U.S.C. §§ 12101 et seq., for employment discrimination on the basis of disability, or retaliation for exercising rights under this statute.

NOTE: To sue under the Americans With Disabilities Act, you generally must have received a notice of right-to-sue letter from the EEOC.

✓ _____ Other (describe) Retaliation, Harassment (sexual)

Discrimination

2. This Court has subject matter jurisdiction over this case under the above-listed statutes and under 28 U.S.C. §§ 1331 and 1343.

Parties

3. Plaintiff. Print your full name and mailing address below:

Name Dausen Taylor
Address 5699 Dunham Rd Maple Hts Ohio
44137

4. Defendant(s). Print below the name and address of each defendant listed on page 1 of this form:

Name Starbucks Corporation
Address 1200 W Paces Ferry Rd NW Atlanta
GA 30327

Name _____
Address _____

Name _____
Address _____

Location and Time

5. If the alleged discriminatory conduct occurred at a location different from the address provided for defendant(s), state where that discrimination occurred:

6. When did the alleged discrimination occur? (State date or time period)

Through ~~8~~ July 2017 up until October 2017

Administrative Procedures

7. Did you file a charge of discrimination against defendant(s) with the EEOC or any other federal agency? ☒ Yes ☐ No

If you checked "Yes," attach a copy of the charge to this complaint.

8. Have you received a Notice of Right-to-Sue letter from the EEOC?

☒ Yes ☐ No

If you checked "Yes," attach a copy of that letter to this complaint and state the date on which you received that letter:

9. If you are suing for **age discrimination**, check one of the following:

☐ 60 days or more have elapsed since I filed my charge of age discrimination with the EEOC

☐ Less than 60 days have passed since I filed my charge of age discrimination with the EEOC

10. If you were employed by an agency of the State of Georgia or unsuccessfully sought employment with a State agency, did you file a complaint against defendant(s) with the Georgia Commission on Equal Opportunity?

☐ Yes

☐ No

☒ Not applicable, because I was not an employee of, or applicant with, a State agency.

If you checked "Yes," attach a copy of the complaint you filed with the Georgia Commission on Equal Opportunity and describe below what happened with it (i.e., the complaint was dismissed, there was a hearing before a special master, or there was an appeal to Superior Court):

Filed Charge With EEOC and sent back
a NO cause, with a Rights to Sue Letter attached

11. If you were employed by a Federal agency or unsuccessfully sought employment with a Federal agency, did you complete the administrative process established by that agency for persons alleging denial of equal employment opportunity?

☐ Yes

☐ No

☒ Not applicable, because I was not an employee of, or applicant with, a Federal agency.

If you checked "Yes," describe below what happened in that administrative process:

Nature of the Case

12. The conduct complained about in this lawsuit involves (check only those that apply):

☐ failure to hire me
☐ failure to promote me
☐ demotion
☒ reduction in my wages
☒ working under terms and conditions of employment that differed from similarly situated employees
☒ harassment
☒ retaliation
☒ termination of my employment
☐ failure to accommodate my disability
☐ other (please specify) _____

13. I believe that I was discriminated against because of (check only those that apply):

☒ my race or color, which is Black
☒ my religion, which is _____
☒ my sex (gender), which is ☒ male ☐ female
____ my national origin, which is _____
____ my age (my date of birth is _____)
____ my disability or perceived disability, which is: _____

☒ my opposition to a practice of my employer that I believe violated the federal anti-discrimination laws or my participation in an EEOC investigation

☒ other (please specify) Sexual Harassment (Retaliation)

14. Write below, as clearly as possible, the essential facts of your claim(s). Describe specifically the conduct that you believe was discriminatory or retaliatory and how each defendant was involved. Include any facts which show that the actions you are complaining about were discriminatory or retaliatory. Take time to organize your statements; you may use numbered paragraphs if you find that helpful. Do not make legal arguments or cite cases or statutes.

I was hired at Starbucks April 5 2016 by a Manager
 Named Steven, Manager Steven Left June 2016, New Manager
 Eric Come in to Replace June 2017, I never had problems
 with Manager Steven. Eric New Manager Come in and
 dropped my hours Drastically to 30 hrs per week to 8-10 hrs
 a week. In July 2017 he started to harass me sexually,
 Flirting, Pro Long Stares, Licking his lips at me, Brushing his hand
 near bottom area. That went on From July 2017 up until
 October 2017. I reached out to District Manager about a
 transfer in August 2017 through October 2017. District Manager
 Stated She was too busy to help me. I approached
 Manager Eric about discrimination, Sexual Harassment advances
 October 14th 2017 and was terminated October 21 2017
 For failure to comply with rules. During the approach
 to Eric I stated I wanted him to stop Flirting and
 Stop Romantic Gestures and he said "you dont shit
 where you work." I said "No." I was terminated
 two days later For a reason thats untrue with witnesses
 to Back my info up, Wrongful Termination due to Retaliation
 of addressing the Sexual Harassment.

(Attach no more than five additional sheets if necessary; type or write legibly only on one side of a page.)

15. Plaintiff ☒ still works for defendant(s)
☐ no longer works for defendant(s) or was not hired

16. If this is a disability-related claim, did defendant(s) deny a request for reasonable accommodation? ☐ Yes ☐ No

If you checked "Yes," please explain: _____

17. If your case goes to trial, it will be heard by a judge unless you elect a jury trial. Do you request a jury trial? ☒ Yes ☐ No

Request for Relief

As relief from the allegations of discrimination and/or retaliation stated above, plaintiff prays that the Court grant the following relief (check any that apply):

- ☐ Defendant(s) be directed to _____

☒ Money damages (list amounts) 20,000

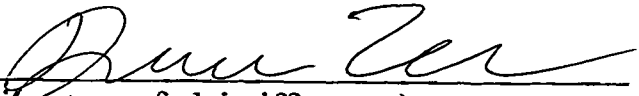
☒ Costs and fees involved in litigating this case

☒ Such other relief as may be appropriate

PLEASE READ BEFORE SIGNING THIS COMPLAINT

Before you sign this Complaint and file it with the Clerk, please review Rule 11 of the Federal Rules of Civil Procedure for a full description of your obligation of good faith in filing this Complaint and any motion or pleading in this Court, as well as the sanctions that may be imposed by the Court when a litigant (whether plaintiff or defendant) violates the provisions of Rule 11. These sanctions may include an order directing you to pay part or all of the reasonable attorney's fees and other expenses incurred by the defendant(s). Finally, if the defendant(s) is the prevailing party in this lawsuit, costs (other than attorney's fees) may be imposed upon you under Federal Rule of Civil Procedure 54(d)(1).

Signed, this 23rd day of December, 2018


(Signature of plaintiff *pro se*)

Dawson Taylor
(Printed name of plaintiff *pro se*)

5699 Dunham Rd Maple Hts, OH, 44137
(street address)

Maple Hts Ohio 44137
(City, State, and zip code)

Dawson.Taylor@yahoo.com
(email address)

404-357-6754
(telephone number)

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: **Dauson Taylor**
5699 Dunham Rd.
Maple, OH 44137

From: **Atlanta District Office**
100 Alabama Street, S.W.
Suite 4R30
Atlanta, GA 30303



On behalf of person(s) aggrieved whose identity is
 CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

410-2018-04116

Ananda L. Harris,
Investigator

(404) 562-6849

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:



The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.



Your allegations did not involve a disability as defined by the Americans With Disabilities Act.



The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.



Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge



The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.



The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.



Other (briefly state)

- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit must be filed **WITHIN 90 DAYS** of your receipt of this notice; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

On behalf of the Commission

Enclosures(s)

Bernice Williams-Kimbrough,
District Director

9/28/2018
 (Date Mailed)

cc: **Danielle Mehallo**
Shareholder
Littler Mendelson, P.C.
2301 McGee Street, 8th Floor
Kansas City, MO 64108

**NOTICE TO
PRO SE PLAINTIFFS**

attaching form Complaint

(revised 2/20/2013)



Representing yourself in Court—called appearing *pro se*—is difficult for persons without legal training. Before doing so, you should consider finding an attorney to take your case. The following referral services may help you find a lawyer:

1. Atlanta Bar Association (404) 521-0777
(serving Fulton, Cobb, DeKalb, Douglas, Rockdale, Paulding, Henry, Gwinnett, Clayton, Cherokee, Fayette, and Forsyth Counties)
2. Cobb County Lawyer Referral Service (770) 424-2947
(serving Cobb, Douglas, Bartow, Cherokee, and Paulding Counties)
3. DeKalb Bar Association Lawyer Referral Service (404) 373-2580
(serving DeKalb, Fulton, Gwinnett, and Cobb Counties)
4. Attorneys' Confidential Referral Service, Inc. (888) 536-5900
(serving all Counties in Georgia)
5. Atlanta Volunteer Lawyers Foundation (404) 521-0790
<http://www.avlf.org>

If you desire to proceed without a lawyer, the attached form complaint has been prepared for your convenience, but you are not required to use it. Please write clearly and fill it out to the best of your ability. **However, completion and filing of this form is no guarantee that your case will succeed.**

You must keep the Clerk of Court informed as to any change in your address or telephone number. You must also follow the Federal Rules of Civil Procedure and the Local Rules of this Court. You may obtain a copy of the Federal Rules of Civil Procedure in most public libraries or at the following website: <http://www.uscourts.gov/uscourts/rules/civil-procedure.pdf>. You may review this Court's Local Rules in the Clerk's Office, purchase a copy from the Clerk's Office, or access this Court's Local Rules at the following website: <http://www.gand.uscourts.gov/pdf/NDGARulesCV.pdf>.